

**UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT**

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GEORGE ZAZZALI,)	
)	
<i>Plaintiff,</i>)	
v.)	Case No. 2:24-cv-1015-kjd
)	
VITALCORE HEALTH STRATEGIES, LLC,)	
)	
<i>Defendant.</i>)	
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STIPULATED DISCOVERY SCHEDULE/ORDER

The parties submit the following Discovery Schedule pursuant to Local Rule 26(a)(3):

1. The parties shall serve initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before August 15, 2025
2. The parties shall serve all interrogatories and requests for production on or before October 15, 2025.
3. Depositions of all non-expert witnesses shall be completed by November 15, 2025.
4. Plaintiff shall submit expert witness reports on or before December 15, 2025.
Depositions of plaintiff's expert witnesses shall be completed by January 31, 2026.
5. Defendant shall submit expert witness reports on or before February 28, 2026.
Depositions of defendant's expert witnesses shall be completed by April 9, 2026.
6. The Parties have agreed to conduct the ENE between November 15, 2025 and December 15, 2025—after the completion of fact depositions but before expert discovery begins. The Parties have agreed that Attorney James Spink and Attorney

Michael Marks would be mutually acceptable neutrals, and are inquiring with their offices regarding availability during this period.

7. The parties shall serve all requests for admission on or before March 9, 2026.
8. All discovery shall be completed by April 9, 2026.
9. Motions for joinder of parties and amendments to the pleadings shall be filed on or before September 15, 2025.
10. Motions, including summary judgment motions but excluding motions relating to the conduct of the trial, shall be filed on or before May 9, 2026.
11. This case shall be ready for trial by July 9, 2026 or 45 days from summary judgment rulings.

Respectfully submitted this 24th day of July, 2025.

/s/ R. Scott Oswald
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*Counsel for Defendant VitalCore Health
Strategies, LLC*

APPROVED and SO ORDERED:

U.S. Magistrate Judge

Date: _____

Local Form/Rule 26(a)(3)